

# **Exhibit 4**

1 UNITED STATES DISTRICT COURT  
2 SOUTHERN DISTRICT OF NEW YORK  
3 -----x  
4 DONNA WOOD, et al, individually  
5 and on behalf of all others  
6 similarly situated,  
7 Plaintiffs,  
8 vs. 20 Civ. 2489 (LTS) (GWG)  
9 MIKE BLOOMBERG 2020, INC.,  
10 Defendant.

11 -----x

12  
13 VIDEOTAPE DEPOSITION OF  
14 RONALD LUIPPOLD  
15 VIA ZOOM VIDEOCONFERENCE  
16 November 29, 2022  
17 10:00 a.m.

18  
19  
20  
21  
22  
23 Reported by:  
24 Maureen Ratto, RPR, CCR  
25

1 RONALD LUIPPOLD

2 always mentioned me in our group meetings  
3 about how well I was doing and they were  
4 asking me questions of what I was doing  
5 and I responded by just saying I was  
6 getting out there and working.

7 Q. You previously testified about  
8 some physical problems that you have been  
9 experiencing since 2018, including  
10 difficulties standing, sitting.

11 Did your physical problems  
12 impact your ability to go from door to  
13 door at all?

14 A. In fact, no. It was actually  
15 perfect for me because I was able to  
16 conduct myself in a manner that was --  
17 I'd be able to give myself breaks, you  
18 know, whether I needed to stand, whether  
19 I needed to sit. I was never in one  
20 position for too long that would be  
21 aggravating to my condition. I still have  
22 headaches but didn't necessarily  
23 experience the physical problems that I  
24 was having associated with the hernias.

25 Q. So when you felt like you

1 RONALD LUIPPOLD

2 needed to take a break you were able to  
3 during your employment with the Campaign?

4 A. Yes.

5 Q. Did your inability to sit for  
6 long periods of time impact you in any  
7 way with respect to your work for the  
8 Campaign?

9 A. No. Because, you know, like,  
10 if I was in the office or something like  
11 that, I'd be able to stand and talk and I  
12 wouldn't necessarily focus on levels of  
13 pain that way, you know, I was moving in  
14 my body in other ways. So I was able to  
15 accommodate any discomfort I was  
16 experiencing at the time.

17 Q. And if you were experiencing  
18 discomfort from sitting for a long period  
19 of time you were able to take a break and  
20 get up and move around?

21 A. Yeah. I mean, I might not  
22 necessarily take a break, I would just do  
23 what I was doing on the phone, you know,  
24 and just kind of move around. Nobody  
25 would know I was doing it other than

1 RONALD LUIPPOLD

2 myself, you know.

3 Q. What kind of phone would you  
4 use when you were making phone calls? Was  
5 it a cellphone?

6 A. Yes.

7 Q. To make sure I understand, so  
8 it's your testimony that you were able to  
9 do the calls while walking around --

10 A. Yes.

11 Q. -- if you needed to?

12 A. Yes.

13 Q. Your resumé also says that you  
14 attended rallies. What rallies did you  
15 attend?

16 A. Well, you know, we had a -- I  
17 don't know if it was rally as much as it  
18 was an event. I mean, there was gun  
19 control, they might have called it a  
20 rally, they might have just called it gun  
21 awareness. Then we did other events like,  
22 you know, walking for health and these  
23 were more events, not rallies. I mean, it  
24 was my duty to attend the rallies if they  
25 happened. I don't recall necessarily

1 RONALD LUIPPOLD

2 VIDEOGRAPHER: We are going  
3 back on the record at 1:30 Eastern  
4 Time.

5 Q. Mr. Luippold, was there a  
6 period of time in February or March of  
7 2020 where your health issues precluded  
8 you from being able to work for the  
9 Campaign?

10 A. Towards the end of the  
11 Campaign, yes.

12 Q. What health issues were you  
13 experiencing toward the end of the  
14 Campaign?

15 A. Nausea, a lot of pain and, you  
16 know, it was debilitating neck pain, back  
17 pain, all stuff that was caused by my  
18 previous injuries, I guess.

19 Q. And when did you start  
20 experiencing this debilitating pain?

21 A. I don't know exactly when this  
22 happened. It was just right around the  
23 time I got back from the debate in Las  
24 Vegas, so it was probably the week after.

25 Q. And at the point when you had

1 RONALD LUIPPOLD

2 this onset of pain, were you performing  
3 any work for the Campaign or did you stop  
4 working altogether at that point?

5 A. No. I was still making phone  
6 calls and I was doing stuff from home at  
7 that point.

8 Q. Were there periods during the  
9 day where you were unable to work because  
10 of your debilitating pain?

11 A. Yes.

12 Q. Now, approximately how many  
13 hours per day were you working during  
14 this period of time, at the end of  
15 February?

16 A. At that point I might have  
17 been reduced to about six hours a day  
18 versus the 12 that I had been performing  
19 prior to that.

20 Q. Was there any period of time  
21 where you were unable to perform any work  
22 at all during your employment with the  
23 Campaign?

24 A. A couple days, yeah, when I  
25 was in the hospital, when I was at the

1 RONALD LUIPPOLD

2 hospital.

3 Q. And when were you in the  
4 hospital?

5 A. It was March, it was towards  
6 the end of the Campaign I believe. Maybe  
7 -- yeah, I think it was in March.

8 Q. And how many days did you  
9 spend in the hospital?

10 A. I don't recall. It was  
11 definitely an extended period of time. I  
12 don't know exactly how long. It brought  
13 me into the spring months.

14 Q. More than a month?

15 A. Yes.

16 Q. While you were still in the  
17 hospital were you still being paid by the  
18 Campaign?

19 A. I don't recall.

20 Q. And were you admitted to the  
21 hospital due to the issues that you just  
22 described, nausea and debilitating neck  
23 and back pain?

24 A. Yeah. Nausea was just a  
25 side-effect. I really went for the



1 RONALD LUIPPOLD

2 debilitating back/neck pain. I was  
3 getting to the point where I couldn't  
4 move.

5 Q. Had you been experiencing the  
6 neck and back pain? Like, had it been  
7 increasing over time prior to the point  
8 where you were hospitalized or was it  
9 more of a sudden onset?

10 A. I don't recall. You know, to  
11 be honest with you, I think it was the  
12 plane ride back from Vegas I started  
13 really having problems at that point. I  
14 noticed it coming on more and more.

15 Q. Did you have to have surgery  
16 at some point in 2020 due to these  
17 issues?

18 A. I don't think so. I was just  
19 in a brace for an extended period of  
20 time, six to eight weeks, I think.

21 Q. During your employment with  
22 the Campaign did you have to attend  
23 doctors' appointments related to the  
24 issues that you've testified about today?

25 A. Not that I recall.

1 RONALD LUIPPOLD

2 Q. Were you receiving any  
3 physical therapy or other type of  
4 treatment for your neck or back issues in  
5 2020?

6 A. I had been prior to the  
7 Campaign and after the Campaign but none  
8 during the Campaign.

9 Q. During your employment with  
10 the Campaign, was there a period of time  
11 where you were working before the Quincy  
12 field office opened?

13 A. Yes.

14 Q. And what period of time was  
15 that?

16 A. You know, I think, if I  
17 recall, they said our hire date -- I  
18 don't recall. I don't recall exactly. I  
19 know it was right after Christmas and  
20 we're doing phone calls back and forth,  
21 meeting at, like, Starbucks, places like  
22 that. Before we had an office and trying  
23 to come up with a game plan.

24 Q. Do you recall approximately  
25 how many weeks you were working for the

1 RONALD LUIPPOLD

2 states you were making phone calls to?

3 A. No.

4 Q. And how often -- how many  
5 times during your employment with the  
6 Campaign did you make phone calls to  
7 other time zones?

8 A. You know, quite frankly, it  
9 would be at the request of the Regional  
10 Director Ross Doty. So, you know, that  
11 would probably happen at the very least  
12 once a week where we'd be calling  
13 nationally.

14 Q. And when you reached a  
15 prospective voter on the phone, was the  
16 objective to speak with the voter about  
17 Mr. Bloomberg's candidacy?

18 A. Yes.

19 Q. How many days per week did you  
20 work at the start of your employment with  
21 the Campaign in January?

22 A. Seven days a week.

23 Q. And did the number of days per  
24 week that you worked change at any point?

25 A. Not until I became ill.

1 RONALD LUIPPOLD

2 Q. And that was in February?

3 A. Late February.

4 Q. And when you became ill, how  
5 many days per week were you working then?

6 A. I believe I was still working  
7 every day until I could no longer. I  
8 mean, I was working minimal hours, six  
9 hours a day, if I recall, until I just  
10 couldn't handle it anymore when I got in  
11 the hospital.

12 Q. And what was the date when you  
13 were hospitalized?

14 A. I don't recall that date.

15 Q. Do you have any records  
16 regarding your hospitalization?

17 A. Not on me. I'm sure there are  
18 records somewhere.

19 Q. Other than at the end when you  
20 became ill, were there any weeks in which  
21 you worked fewer than seven days?

22 A. No.

23 Q. As a field organizer did you  
24 have any involvement in selling Campaign  
25 merchandise?